



ZVRS
600 Cleveland Street, Suite 100
Clearwater, FL 33755
VideoPhone: 727-431-9692
Voice: 727-254-5600
Fax: 727-443-1537
www.zvrs.com

REDACTED - FOR PUBLIC INSPECTION

September 21, 2016

VIA HAND DELIVERY AND ELECTRONIC FILING

Accepted / Filed

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

SEP 21 2016

Federal Communications Commission
Office of the Secretary

RE: ZVRS Request for Limited Waiver
Structure and Practices of the Video Relay Service Program; Telecommunications
Relay Services and Speech-to-Speech Services for Individuals with Hearing and
Speech Disabilities, CG Docket Nos. 10-51, 03-123

DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

CSDVRS, LLC d/b/a ZVRS ("ZVRS") hereby submits its request for limited waiver of certain requirements contained in the Telecommunications Relay Service ("TRS") rules. In accordance with the Protective Order issued in the above-captioned proceedings on March 14, 2012,¹ attached are one copy of the comments in their original form and two redacted copies. A redacted copy will also be filed for public inspection via the Commission's Electronic Comment Filing System.

Pursuant to 47 C.F.R. §§ 0.457, 0.459, and the Protective Order, ZVRS requests that the Commission provide confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the attached waiver request and withhold that information from public inspection. The confidential information has been redacted from the version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

As this information is submitted voluntarily and absent any requirement by statute, regulation, or the Commission, ZVRS requests that, in the event that the Commission denies the ZVRS request for confidentiality, the Commission return the materials without consideration of the contents therein.²

¹ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, Protective Order, DA 12-404, at ¶ 4 (CGB 2012) ("Protective Order").

² See 47 C.F.R. § 0.459(e).

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In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS hereby states as follows:

1. Identification of the specific information for which confidential treatment is sought.

ZVRS requests confidential treatment with respect to the confidential information between the headings [***BEGIN CONFIDENTIAL INFORMATION***] and [***END CONFIDENTIAL INFORMATION***] and redacted from the version filed electronically with the Commission.

2. Identification of the circumstance giving rise to the submission.

ZVRS is requesting a one-time, limited waiver of certain TRS rules.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The confidential information in the ZVRS comments and associated exhibits is highly sensitive commercial information specific to the operations and strategies of ZVRS. This information is generally safeguarded from competitors and is not made available to the public.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information involves VRS, a nationwide competitive service.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because it would provide competitors insight into confidential operational and strategy information that would not otherwise be available, which would work to ZVRS's severe competitive disadvantage.

6. Identification of any measures taken to prevent unauthorized disclosure.

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties, except where required by the Commission and the TRS Fund Administrator, each of whom protect the confidentiality of such submissions.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

ZVRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to ZVRS.

Respectfully submitted,

/s/ Sherri Turpin
Sherri Turpin
Chief Executive Officer

Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	Accepted / Filed
Disabilities)	
)	
Structure and Practices of the Video Relay)	CG Docket No. 10-51
Services Program)	
Technology)	

SEP 21 2016
Federal Communications Commission
Office of the Secretary

PETITION FOR LIMITED WAIVER

BEGIN CONFIDENTIAL INFORMATION

[*END**

CONFIDENTIAL INFORMATION*]**

Respectfully submitted,

/s/

Gregory Hlibok
General Counsel
CSDVRS, LLC d/b/a ZVRS
600 Cleveland Street, Suite 1000
Clearwater, FL 33755

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